



October 26, 2007

**RE: NOTICE OF PROPOSED RUEMAKING, DEPARTMENT OF
HOMELAND SECURITY BUREAU OF CUSTOMS & BORDER PROTECTION,
[USCBP-2007-0064], RIN 1651-AA41, AMENDING 19 CFR PART 122**

Representing over 10,400 members and pilots of Beechcraft airplanes, the American Bonanza Society opposes the U.S. Customs and Border Protection NPRM for cross-border flight notification for these reasons:

- At present, existing law (as a result of the 9/11 Commission's Report) requires all international flights inbound to the US to provide passenger and crew manifests prior to departure from the foreign point of origin. This basic requirement is not in issue. What we oppose is the proposed method of compliance.
- In the case of general aviation, business aviation and some charter flights, the foregoing legislative requirement is satisfied at present by one of two means:
 - a) Telephone communication (including satellite telephone) from the point of origin abroad to U.S. Customs within the U.S., or
 - b) Submission of the INBOUND manifest via telephone prior to the OUTBOUND departure of the aircraft from the United States
- The NPRM would require that the SOLE means of compliance with the foregoing manifest notification requirement be the INTERNET NOTIFICATION submitted prior to 60 MINUTES before the DEPARTURE from the foreign origin with the additional requirement that the pilot submitting such manifest wait to receive an internet acknowledgment of his transmission and authorization to enter the United States prior to departing the foreign origin.
- The internet reporting requirement of the NPRM is unworkable given the frequently inferior reliability or total absence of internet capability in several neighboring foreign countries including many regions of Mexico and the Caribbean.
- Further, according to the Department of Homeland Security there are approximately 138,000 aircraft border crossings per year which DHS

equates to 778 aircraft and to 2,335 passengers each day. This would require that the department after receipt of each manifest review and electronically acknowledge each transmission.

- We also oppose the proposed requirement for CBP approval of flight manifests for DEPARTING the United States. A free society should not limit the right of its citizens and legal visitors to legally exit the country.

Given the unworkable and impractical requirements proposed, the American Bonanza Society, while remaining supportive of our nation's need for security, request the withdrawal of this NPRM.

Respectfully

Art Brock, President
American Bonanza Society